

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT Knoxville

AUG 15 2022

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

Mr. Adrian Kenton Madin JR.,)

Tdoc #547334 .)

Pro'se - Plaintiff)

(Enter above the NAME of the
plaintiff in this action.))

v. Warden)

Mr. Mike parri's Gunderstaff)

Stacey oakes & Steve Jones)

c/o Ms. Kaulyn Coffey et al)

(Enter above the NAME of each
defendant in this action.))

Civil Suit + Complaint

Case No. 3:22-MC-00029-
KAC-JEM

8th Amendment Use. of. Force
abuse. under. Chr. of. State.
Law. Violation(s) et al.

3:22-cv-282

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(42 U.S.C. Section 1983)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? YES () NO (✓)

B. If your answer to A is YES, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to the previous lawsuit:

Plaintiffs: _____

Defendants: _____

2

2. COURT: (If federal court, name the district; if state court, name the county):

3. DOCKET NUMBER: _____

4. Name of Judge to whom case was assigned: _____

5. Disposition: (For example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. PLACE OF PRESENT CONFINEMENT: Marang County / M.C.C.X

A. Is there a prisoner grievance procedure in this institution? YES (✓) NO ()

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? YES (✓) NO ()

C. If your answer is YES,

1. What steps did you take? on 9/30th/2021 i file [an]

Inmate grievance against My use of force abuse .

2. What was the result? The grievance chair person Staff
Cpl. j. Byrge ; Never answer (not once) .

D. If your answer to B is NO, explain why not. _____

E. If there is no prison grievance procedure in the institution, did you complain to the prison authorities? YES (✓) NO ()

F. If your answer is YES,

1. What steps did you take? i Contact Warden: Mike parris

under inmate request form sheet He Never Answer .

2 .

2. What was the result? Warden: Mike parrie Violated my First Amendment by freedom of speech.

III. PARTIES

(In item A below, please place your name in the first blank and place your present address in the second blank. Do the same for any additional plaintiffs.)

- A. Name of plaintiff: Mr. Adrian Kentron. madin JR.
Present address: M.C.C.X 541 Wayne cotton morgan Drive Warburg TN 37887
Permanent home address: 2925 Wingate Street Memphis TN 38127-825
Address of nearest relative: 3398 Covington Pike, Memphis TN 38128.

(In item B below, place the FULL NAME of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the additional names, positions, and places of employment of any additional defendants.)

- B. Defendant: Mr. Mike parrie / Supervisory Liability.
Official position: M.C.C.X Head Warden.
Place of employment: Morgan county Correctional Complex.
C. Additional defendants: C/o s Kaylyn Coffey, Derrick daughter
A.T.W. Steve Jones, + Stacy oakes et al.

IV. STATEMENT OF CLAIM

→ 8th Amendment Use of force abuse Under color of State LAW Violation(s).

(State here as briefly as possible the FACTS of your case. Describe how EACH defendant is involved. Include also the names of other persons involved, dates and places. DO NOT give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.)

Thus come(s) prose-plaintiff: Mr. Adrian Kentron JR.)
This is a civil action authorized by 42 U.S.C at

3.

IV. Statement of Claim 4 (of) 18 .,

Section 1983 To redress The deprivation,
under color of State Law, of rights secured By
The Constitution of The United States .

This Court has jurisdiction under 28 U.S.C. at
Section 1331 & 1343(a)(3) . / Plaintiff seeks
declaratory relief pursuant to 28 U.S.C. Section 2282
& 2284 & Rule 65 of The Federal Rules of Civil
Procedure .

This U.S. District Court of Knoxville, Tennessee
is appropriate venue under 28 U.S.C. Section at
1391.(b)(2) because it is where The events givin
rise to This Claim occurred .

Thus on September 29, 2021 C/o Ms. Kaylyn Coffey
said defendant did unlawfully violated The
Tennessee Law at T.C.A. § 41-1-103 with of office
as she opened "a" maximum security door
without first placing handcuffs on
Plaintiff: Mr. Adrian Kentron. Madin JR.,

This ViConnet Video System at unit 23-B pod
at Cell # 208 will be use as (Exhibit #1)
& Subpoena were The above defendant C/o Ms. Coffey
was proceeding to assault The held
above plaintiff as she did force
her finger(s) in His facial area .



IV. Statement of Claim 5 of 18.

As Plaintiff Made His attempt To Smack's defendant: C/o. Coffey's hands away from His face She The above defendant pressed Her SAIC emergency panic button To get help from Several un'known officers which arrived in The unit 23-B pod indoor area including SAID Defendant: Derrick Dougherty., at This time Plaintiff was peppered sprayed in His mouth eye(s), ear(s), nose, area(s) & jumped on By Assault(s) from Derrick Dougherty & other un'know official officer(s) as They all 'Slam'd Plaintiff To floor & forcefully Place handcuff(s) on Him as all Defendant(s) are on (Exhibit #1) The Viconnet Video System Seen Taking Plaintiff To The institutions intake gallery & place Him in Cell by The unknown amount(s) of officer(s) including Defendant: Derrick Dougherty., Were Aft To Subpoena (Exhibit #2.) Which is The held "institutions intake gallery area", on arrival in This holding Cell Plaintiff was force To face The Wall BUT He was unable To see Because His Vision Black'ed out from The pepper-spray. as His Handcuffs were being removed Plaintiff Heard "an" officer(s) Voice Say "Go.", & He was Being ASSault'ed By ATTACK(s) of Hit(s) made By Punch(s) with Close fist along with Being Kick'ed Several time(s) in The Body →

IV. Statement of Claim 6 of 18.

3 The Back of His Head area(s) were Several Minutes Had passed before This Beating have been Stopped.

Were Plaintiff: Mr. Adrian Kenton Martin Jr., heard one un'known officer speaking 3 say Let(s) go fellas, He(s) NOT fighting back He's demoralized, He's a bitch. This was said out loud Several time(s) doing This false attack The above plaintiff Cry'd out in anguish to Stop.

as Several hours had passed were the above Plaintiff was approached by said defendant(s): Derrick Daughte 3 Justin Moore as The Both proceeded To take Several photo(s) of Plaintiff(s) Body injure's were defendant(s) order Him to Turn at different angles as again without Warring defendant: Justin Moore Hit Plaintiff Twice with [an] close fist 3 Daughter with The help of Two other un'known officer(s) Took Plaintiff To The ground 3 They all state'd To Darage of kick(s) To His entire body 3 Plaintiff was Then put Back into Handcuff(s) a second time.

Thus Plaintiff would like To use (Exhibit #3) By Subpoena at time apxx: 11:30 a.m. hour(s) of "institutions intake gallery holding Cell room area". of This 3rd Beating was never giving anykind of relief from The receiving of medical attention as during Beginning of This incident. →

IV. Statement of claim 7 of 18.

Therefore Defendant(s) Warden Mr. Mike Parris, head Warden, 3 Under Staff Warden(s) Steve Jones, + Stacy Oakes, which are all held to be under Supervisory Liability Because under The Body of Tennessee Law at T.C.A. § 41-1-1a4) at (b) The custody, welfare, Conduct 3 Safekeeping of The inmates shall be The responsibility of The Warden, Who will examine into The affairs of The institution daily To assure That proper Standards are maintained.

This was deprived by deprivation under color of State Law as all Under Staff Defendant(s) Has Clause Violation(s) within T.C.A. § 41-1-b3 at area (A) all of ficers and other persons so employed To control 3 manage The penitentiary for The state shall, before entering upon The discharge of Their duties, Take 3 subscribe The following oath.

Plaintiff AVer(s) / Defendant(s) C/o Ms. Kaylyn Coffey 3 C/o Mr. Derrick Dougherty + unknown of ficial

Correctional officer(s) unlawfully acted against (C) The Violation of This oath by any of The of ficer(s) "or" employees shall be perjury Punishable as in other Cases of perjury.

Where plaintiff AVer That all Warden(s) Name'd above are held responsible under area at (b) The oath of The assistant or deputy Commissioner / Wardens 3 Superintendents shall be filed with The

IV. Statement of Claim 8 (of) 18

Secretary of State. The oaths of all other employees shall be filed with The Commissioner of Correction.

Therefore Pro'se - plaintiff: Mr. Adrian Kenton Madin Jr Has State a claim for relief being That The Warden(s) are responsibility for none proper Training of There understaff(s) Defendant(s) during Physical altercations Thus failed to properly guide of ficer(s) in Their duties By official public Tennessee department of.

Correction(s) M.C.C.X penitentiary officer(s) Has Cause [Eighth Amendment(s) Violation(s)] done By The use of unlawful force Which HA open relief under Section 1979 of The Revised

Statutes of The united States [42 U.S.C. 1983] is amended By adding at The end The following -> it shall NOT be a defense "or" immunity in any action brought Under This Section against a local law enforcement of ficer (as such Term is defined in Section 2 of The George Floyd justice in Policing act of 2021). There fore Plaintiff: Mr. Adrian Kenton Madin Jr, Aver Defendant: Tony Parker, former Tdoc Commissione is held Under responsibility Due because of Supervisory Liability Because His understaf Member(s) Has deprived T.C. As 41-1-103 Thus The Violation(s) made against T.C. As 41-1-104 at

Warden, towers 3 duties error(s) of State LAW Both

IV. Statement of Claim 9 (of) 18.

area(s) (A) & (B). 'Pin Point(s)'
under The SAID direction & control of The
Commissioner of Correction.

Which open(s) Tennessee State Law under
T.C.A. § 4-3-606 powers & duties. were
The department of Correction shall exercise all The
rights. Powers & duties described in Chapter 6
of This title & otherwise Vested By Law in The
Department. The Commissioner, & The Commissioners
officers, assistants & employee(s). Therefore in order

To state a claim must allege that The
Supervisors were somehow personally involved in
The SAID unconstitutional personally Activity
as The Defendant: Tony Parker, is SAID By
Law is required under The grand(s) of
Official-Capacity action.

Because
a governmental entity To be liable under
§ 1983 Civil Suit only when The entity itself
is [an] moving force behind The held
deprivation Thus in [an] official-capacity suit
The entity(s) Policy "or" Custom must have played
a part in The violation of federal Law
as see → T.C.A. § 41-1-1a3 oath of office
was The moving force That clause clear
deprivation Done By it(s) Supervisory liability
Theory only because The former: Commissioner
Mr. Tony Parker, #29 Understat + Warden: Mr. Mike Davis

IV. Statement of Claim 10 of 18.

Morang County State Prison Correction Officer(s) was personally involved or acquiesced in any Unconstitutional Conduct as plaintiff aver his Claim(s) Thus fall(s) against above held Defendant: Tony Parker, for each allowed illegal action(s) outline under (Supervisory Liability See ex parte Young teaches that when a state officer act(s) under a state law in a manner violative of The federal Constitution, he (or) she comes into conflict with The Superior Authority of That Constitution & he (or) she is in that case (stripped) of his said official (or) representative character & is subjected in his person to the consequence of his [individual conduct]. Thus plaintiff Claim(s) Deprivation which can be held liable for Damages(s) where the failure to supervise due amount(s) to → (Deliberate Indifference) to the rights of persons incarcerated guiding this said Determination is The Supreme Court's recent decision in City of Canton v. Harris, 489 U.S. 378, 109 S.Ct. 1197, 103 L.Ed. 2d 414, 91-1 (1989). Liability only where the failure to train amount(s) to ground(s) (Deliberate Indifference) to the right(s) of persons with whom the police came into contact.

IV. Statement of claim 11 (of) 18 ;

Fed. R. of Civil P., 8 any Claim(s) for relief MUST Contain Allegations That Show That The Plaintiff: Mr. Adrian K. Madin JR., was deprived of right(s) Guaranteed By The Constitution (of The Law(s) of The United States(s)), Thus To State a Valid Claim for relief That is plausible on its face "an" Complaint must contains Sufficient factual matter(s) as Accepted as True → Heinrich v. Waiting angels adoption Services, inc., 668 f.3d.3993, 403 (6th Cir.2012) & Ingomex v. U.S. aa v. Fed Sav. bank., 171 f.3d.794, 795-96 (2nd Cir.1999). The above Plaintiff AVER(s) holding That dismissal of a pro'se Complaint under §1915(e)(2)(B) should be done with leave To amend unless The Court can rule out any possibility however unlikely it might be That The amended Complaint would Succeed in Stating a Claim up on its face → Lopez v. Smith., 203 f.3d.1122, 1124. (9th Cir.2000). (en banc) (Same) See Daz row x v. Scott 136 f.3d.1054. (5th Cir.1998) holding under 42 U.S.C. § 1997 (e) (C) That The dismissing a pro'se Complaint Contains a potentially Cognizable Claim as → plaintiff Should be allow To particularize The Claim • Thus Therefore Plaintiff AVER(s) furthermore, Federal Rule(s) of Civil procedure 8(a)(2) requires only a Short & Plain Statement of The Claim showing

IV. Statement of Claim 12 (F) 18.

That The pleader is entitled "To relief".

Specific facts are not Necessary.

The statement need only Give The defendant(s) fair notice of What The Claim is & The held Ground(s) upon which it rest. at

Id. 2200 (quoting under Twombly 127, S.Ct. 97526 f. 3d. 291, 1964).

As Come(s) The pro'se plaintiff: Mr. Adrian Madija Jr. seeks(s) To make entry of Hi(s) infliction of unnecessary Pain & Suffering along with The inflicted use of force amount(s) To The unnecessary & Wanton infliction of pain a Plaintiff seeks(s) \$250,000.00 dollar(s) against Defendant: Ms. Kaylyn Coffey, for The heli Pain & Suffering abuse & \$250,000.00 dollar(s) against The above defendant for Mental distress abuse & \$250,000.00 dollar(s), against The above defendant for Physical & mental danger abuse & \$250,000.00 dollar(s) against The above defendant for emotional distress + mental anguish as The full Total for Conduct by The held SAID defendant: Ms. Kaylyn Coffey, abuse under color of State Law By depriving Plaintiff of His Civil right(s). Apply(s) \$1,000,000.00 Dallar(s) as Plaintiff seeks(s) \$250,000.00 dollar(s) against Defendant: Derrick Vaughtery, for The held

IV. Statement of Claim 13 (of) 18

Pain & suffering abuse & \$250,000⁰⁰ dollar(s) against
Mental distress abuse.

\$250,000⁰⁰ dollar(s) for physical & mental danger
abuse. \$250,000⁰⁰ dollar(s) for emotional distress
+ mental anguish; as the full conduct by the said

Defendant: Mr. Derrick Dougherty, abuse under color
of state law by depriving plaintiff of his civil
right(s). Total amount \$1,000.00⁰⁰ dollar(s)
along with prose-plaintiff: Mr. Adrian Kenton Madin Jr.

Seeks \$250,000⁰⁰ dollar(s) against both of the
Defendant(s) C/o: Ms. Kaylyn Coffey, & Co-party
Staff: Mr. Derrick Dougherty, for the

Violation of Tennessee law under the said
T.C.A. §41-1-103 officers & employees, oaths &
affirmations. Thus due to area (C) → the
Violation of this oath by any of the officers or
employees shall be perjury punishable as in other
cases of perjury.

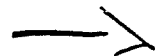
Therefore each warden(s) / Mr. Mike Parris, & his
under staff / Mr. Steve Jones, along with
Mr. Stacy Oake(s), are held against
the said \$250,000⁰⁰ dollar(s) each
for the clause of under staff violation
of the Tennessee law at T.C.A. §41-1-103 at
(A) which was deprived by deprivation at

I V. Statement of Claim 14 of 18

Plaintiff seek(s) \$250,000.⁰⁰ 'dollar(s)' from each held said Warden(s) for The Violation(s) of Tennessee Law at Said T.C.A. § 41-104 et Warden, Powers & duties, were area (b) was never Applied before "or" after The fact of The understaff C/O(s) use-of-force Abuse which was done out of (Malicious intent). That Claus The first amendment-protected interest Violation(s) Could it self Const; tute compensable injury whole apart from any → emotional distress, humiliation & personal indignity, emotional pain, embarrassment, fear, anxiety, & anguish suffered. By The Said Pro se- plaintiff: Mr. Adrian Kenton Madin Jr., Thus

Consequently The basic purpose of § 1983 damages is To Compensate person for injuries That are caused By The deprivation of Constitutional rights as review → Carey v. Phipps, 435 U.S. at, 254, 98 S.Ct. at 1047, (emphasis added) See id, 257, 98 S.Ct. at 1049 (damages awards under) § 1983 should be governed By The principle of Compensation.

as Come The above Said plaintiff seek(s) 250,000 dollar(s) against each Warden(s) for The Said Supervisory Liability Thus for it(s) breach of duty(s) because of one(s) held Said Physical injury(s) & or To one(s) health.



IV. Statement of Claim 15 of 18

See at/ Memphis Community School dist v. Stachura.
477 U.S. 299. 106 S.Ct. 2537. 91 L.Ed. 2d. 249.

(1986). Plaintiff Aler(s) Accordingly When 1989 Plaintiff
Who seek damages for Violation(s) of any kind
of Constitution right(s). The Level of damages
is ordinarily determined according To principles
derived from The Common Law of Torts., Thus
Therefore The full amount should stand \$ 750,000⁰⁰
dollar(s) against The Warden(s) Must Be said
To uphold That amount. → because of There held
1 of it(s) held said understaff C/o Ms. Kaylyn Coffey
3 Her Co party staff Mr. Derrick Doughther. main
Environment which Has Clause Suffered Made By
Retaliatory action(s) done of prison officials.
See at/ Gafountain v. Harry United States Court of
Appeal(s). Sixth Circuit May 22, 2013. 716 F.3d.
944. 85. Fed. R. Ser. V. 3d. 1166.

Therefore plaintiff seek(s) \$ 1,000,000⁰⁰ dollar(s)
against T doc/Commissioner: Ms. Lisa Helton.
due To Supervisor liability *

were Her understaff Warden(s) Un'Constitutional
behavior of alleged Deprivation can be held
Liable for Damages Where The failure
To Supervise amount(s) To down right
[Deliberate indifference] To The right(s)
of a persons incarcerated at The →

IV. Statement of Claim 16 (of) 18

Tennessee Department of Correction(s). This determination is The Supreme Court(s) recent decision in City of Canton v. Harris, 489 U.S. 378, 109 S.Ct. 1197, 103 L.Ed.2d 412 (1989) in Canton The City appealed as Sixth Circuit decision which held that a municipality could be liable for failing adequately to train its staff police force where the municipality recklessly intentionally (of) with gross negligence failed to train its officers under circumstances in which a deprivation of Constitutional rights was substantially certain to result.

As under Tennessee Law at T.C.A. § 4-3-603 Commissioner(s) duties: Ms. Lisa Helton Her understaff Warden(s) at Morang County State Prison Lower Level(s) C/O's abuse was said actionable by deprivation(s) that was caused by the based on [misuse of power] possessed by virtue of state law & made possible only because the wrongdoer(s) is clothed with the authority of state law. / As The Tennessee Law at T.C.A. § 4-3-606 power & duties has been unlawfully blind to its duty to provide fair training to uphold its duty & such training which should ensure plaintiff's His safety against deprivational harm(s) →

IV. Statement of Claim 17 (F) 18.

See Hutto v. Finney, 437 U.S. 678, 98 S.Ct. at 2565, 57 L.Ed.2d 522 (1978) if it is Cruel & unusual punishment To *316 hold convicted criminals in unsafe conditions.

it must be unconstitutional To Confine The involuntarily committed -- who may not be punished at all -- in unsafe conditions.

as This clause [an] Eighth Amendment error(s) Made Against [Deliberate indifference] AS Pro'se - plaintiff: Mr. Adrian K. Madin JR., AVer(s) The Tennessee department of Correction Short for (T.D.C.) are under T.C.A. § 8-8-303.

Waiver of governmental immunity, appointed special deputies, special volunteer & reserve sheriffs deputies Because at area (b) of The plaintiff shall be required To such special deputy. Whether The special deputy is acting Within The scope of employers "or" not.

Such immunity from suit shall not Apply in The case of Special Volunteer "or" said reserve sheriffs deputies While performing official law enforcement duties under Supervision "or" direction of The Sheriff.

As Under → 28 U.S.C. A. § 1343 Civil rights & elective franchise at area (A) The district Courts shall have original jurisdiction of any civil action authorized by law To Be commenced By any person. Were all Defendant(s) in This civil suit are under The 1979 ACTs. Section 3 of Pub L. 96-170 provide that: The Amendment made by This ACT →

IV. Statement of Claim 18 (of) 18.

[Amending This Section & Section 1983 of Title 42,
The public Health & Welfare.]

Shall apply with respect To any deprivation of
~~rights~~, Privileges, "or" immunities secured by The
Said Constitution & Laws occurring after the date
of The enactment of This act (Dec. 29. 1979) Therefore
The Defendant(s) refused & ignoring The Said
imminent risk Caused To prose-plaintiff Mr. Madison
By [Use of force] Which Clause Assault By
unlawfu attack(s) of C/o ms. Kaylyn Coffery 1/3

Co party Staff: Mr. Derrick Dougherty were The face
of This Civil Suit Complaint Validate deprivation
Under Color of State Law as Morang County State
prison official(s) Have deprived away from it(s)
own T.C.A. § 41-1-103 area (A) Made Courtless
Violation(s) against The oath of office under
officers & employees, oaths & affirmation(s) at ←

(C) → The Violation of This oath by any of The officers
"or" employees shall be perjury + punishable as in other
Case(s) of perjury.

Thus The full giving amount \$ 6,000,000 ^{cs} million dollars
Dollar (s) Should stand Under The review of This
U.S. district Court of Knoxville, Tennessee as prose
Plaintiff HAS state a Claim for relief upon its face
as Defendant(s) are To answer under Rule 8 at area
(D) → Defenses: Admissions & Denials (end.)

V RELIEF 1 of 3 .1

(State BRIEFLY exactly what you want this Court to do for you. Make NO legal arguments.
Cite NO cases or statutes.)

(A) —> Plaintiff seeks his right under 7th Amendment relief to a jury trial because my self prose Mr. Adrian Kenton Madin JR. submitted enough factual matters to support (any) 8th Amendment Violation(s) use of force abuse under color of State Law

SIGNED THIS 08th DAY OF August, 20 22.

x Mr. Adrian K. Madin JR. 
SIGNATURE OF PLAINTIFF

v. relief 2 of 3

(B) → Plaintiff seek(s) The defendant: Mrs. Lisa Helton which is The Head T.d.o.C Commissioner upholds Her Tdoc policy index # 305.01 Employee disciplinary action(s).

under I.V. Definition (A) appointing Authority were Morang County Main Warden Defendant: Mr. Mike Parris, du Apply unsatisfactory Conduct against his held under Staff C/000 Defendant(s): Ms. Kaylyn Caffey & Coparty Mr. Derrick Dougherty, & all unknown officer(s) on Viconet Video System Day of The Said September 29, 2021.

all be held against area (C) → dismissal(s) The termination of [an] employee from his/her position for disciplinary reason's as The Law of The Land stand(s) By Plaintiff relief stand(s) under → T.C.A. § 8-30-316. The notice of termination must outline reasons for The dismissal & explain how The good of its service is served by The action.

V. relief 3 (of) 3

Thus prose/plaintiff Mr. Adrian K. Madin JR.,
Seek(s) That all defendant(s) are To Be
Held against The Tennessee Law within said
T.C.A. § 8-8-302 Suits against County
anyone incurring any ~~wrong~~, injury, loss damage
or expense resulting from any act (or) failure to
act expense resulting from any act clause
on the part of any deputy appointed by The Sheriff
May bring suit against The County in which The
Sheriff serves, provided, That The deputy is,
at the time of such occurrence! as it is clear
[Acting by virtue of or under color of The office
as all defendant(s) are under Individual capacity
under This Civil Suit § 1983 Complaint as by law
under Administrative policies & procedures state
of Tennessee department of Correction index # 105.
at area V Policy → (Tdoc employees who are
sued or subpoenaed in Their professional
capacity shall receive service of process &
notification of The Suit or Subpoena.)

- Sworn Affidavit -

Plaintiff request Max \$6,000.000⁰⁰ dollar's
Dollar's) if This lawsuit goes Before a
jury Trial & Plaintiff is giving all fair'ness
Through out jury Trial Verdict goes in this
Behalf (or) if all defendants Can come
Together within "A" fair SETTLEMENT deal
agreement Between max Cap request above as
inorder To keep The civil Complaint suit From
Going To Trial Before jury of (6) member(s)
due emotional distress & Suffering abuse.)
The Eighth Amendment Use of force under color
of state LAW abuse.) & Mental distress abuse
& Cruel & unusual punishment abuse.) & physical
& mental danger.) & deliberate & Indifference
abuse.) & Supervisor liability Violation(s)
Which & Clause failure of duties To provide
Such Training To ensure Safety under The
Tennessee LAW T.C.A.s 41-1-103 oath &
employees; oath & affirmation(s) & Violation
Against T.C.A.s 41-1-104 warden, power & duties.)
x Admission

Pro'se-Plaintiff Date 7/30/2022.

x

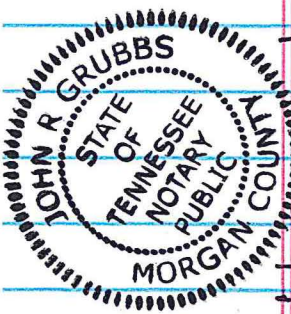
Notary Public Sworn To & subscribed Before me
This 30th day of July 2022.
my Commission expires on 6/22/22.

Sworn Affidavit

Plaintiff x Mr. Adrian Madin JR. State under oath he would like this court to due hand pick the Civil Suit jury trial of said start of 12-3 dropped down to just (6) member(s) from the Knoxville, TN V 3 said Chattanooga TN District area(s) as no jurors can be apart of this jury trial if he (or) she have any kind of family member(s).

That has ever worked for the jail system County(s) under the state of Tennessee (or) the Tennessee department of correction(s) as public officials class staff member(s) "or" any higher level state paid job(s) within the state of Tennessee.

as the jury member(s) will be of both color(s) white & black Plaintiff states its never about the race card within this lawsuit but right from wrong & the unlawful deprivation of held disrespect under oath of color of state law abuse from each said Defendant(s) that disowned the above Plaintiff right(s).



Rose plaintiff x Adrian Madin JR., Date 7/30/2022.
Notary → x [Signature] Sworn To & Subscribed To
Before me This 30th day of July 2022.
my Commission expires on 12/22/22.